

DELAWARE PUBLIC SERVICE COMMISSION
DOCKET 06-241
PUBLIC COMMENT
Tuesday, August 29, 2006

To Ms. Karen Nickerson:

Thank you for the opportunity to participate in the public workshop review of DP&L's draft Integrated Resource Plan setting forth selection criteria for bid evaluations of any new electric generation capacity in Delaware. As a representative of Citizens for Clean Power, a downstate grassroots organization of 150 members backed by numerous organizational endorsements, I would like to second the assessment made by Professors Kempton and Firestone in their testimony that the DP&L presentation did not adequately respond to the legislative mandate of HB 6, in defining selection criteria far too narrowly and with disproportionate weight given to short-term cost benefits. The legislation's requirement to measure the "cost -effectiveness" of any new energy supply bid requires, it seems to us, (as Firestone and Kempton argue) a serious attempt also to monetize and thus quantify the costs to human health, wildlife and water quality, water consumption, waste management and potential land inundation for any new bid if the bidding criteria are to represent a level playing field for the competitors.

I do not know how difficult it may be to quantify other factors, but statistics on health care impacts of power generation are readily available and in no way inconsiderable. As one of our members, John Austin, a retired EPA scientist, calculated in his letter to the commission, the annual cost to the taxpayers of Delaware from the much reduced emissions even of a state of the art coal gasification unit that might be installed at Indian River would exceed \$19 million dollars annually. The Ozone Transportation Commission calculates the national savings from meeting the EPA's new Clean Air Interstate Rule (CAIR) as \$54 billion in 2010 and \$110 billion when fully implemented. Maryland has estimated \$3.5 billion in savings from the stringent new clean-up of old coal generators that Maryland's Healthy Air Act imposes. Last year the federal government estimated that modest reductions in SOX (36%), NOX (27) and mercury (54%) would mean health cost benefits of \$420 million in Delaware by 2020 and reduce premature deaths by 70 annually.

We believe it is high time that health issues and health care costs get attention in regulation of the electric utility industry, which has long ignored the damage its poisons generate and the taxpayers who must subsidize its shameless profiteering.

Sincerely,